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September 29, 2023

## By ECF

The Hon. Katharine H. Parker United States District Court Southern District of New York 500 Pearl Street, Room 750 New York, NY 10007

Re: GMO Internet Group, Inc. et al. v. Whinstone US, Inc., No. 1:22-cv-05974-JPC-KHP (S.D.N.Y.)

Dear Judge Parker:

We represent Whinstone US, Inc. in the above-referenced matter and write on behalf of the parties to jointly request an extension of time to serve third-party subpoenas. Following the August 22, 2023 Case Management Conference, the Court entered an order directing the parties to serve third-party subpoenas by October 4, 2023. (Dkt. No. 89.) The parties are in the process of finalizing an initial set of subpoenas and expect them to be served on or before October 4. However, the parties respectfully request that the deadline for service of any subpoenas be extended until November 30, 2023 to allow the parties sufficient time to navigate the complex process of serving non-U.S. entities/individuals and to permit the parties to have a reasonable period of time to review party discovery.

Respectfully submitted,

/s/ Maeve O'Connor

Maeve O'Connor